

**MAZIE SLATER KATZ & FREEMAN, LLC**

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

Phone: (973) 228-9898 - Fax: (973) 228-0303

[www.mazieslater.com](http://www.mazieslater.com)

David A. Mazie\*  
Adam M. Slater\*<sup>o</sup>  
Eric D. Katz\*<sup>o</sup>  
David M. Freeman  
Beth G. Baldinger  
Matthew R. Mendelsohn\*<sup>o</sup>  
David M. Estes  
Adam M. Epstein<sup>o</sup>

Karen G. Kelsen<sup>o</sup>  
Cory J. Rothbort\*<sup>o</sup>  
Michael R. Griffith<sup>o</sup>  
Christopher J. Geddis  
Samuel G. Wildman  
Julia S. Slater<sup>o</sup>  
Trevor D. Dickson

<sup>o</sup>Member of N.J. & N.Y. Bars

\*Certified by the Supreme Court of  
New Jersey as a Civil Trial Attorney

April 6, 2022

**VIA ECF**

Honorable Robert Kugler, U.S.D.J.  
U.S. District Court - District of New Jersey  
Mitchell S. Cohen Building & US  
Courthouse  
1 John F. Gerry Plaza, Courtroom 4D  
4th and Cooper Streets  
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)  
Special Master  
Stevens & Lee  
1500 Market St., East Tower, Suite 1800  
Philadelphia, Pennsylvania 19103-7360

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***  
**Case No. 1:19-md-02875-RBK (D.N.J.)**

Dear Judge Kugler and Judge Vanaskie:

I am writing to update the Court regarding the status of the Parties' discussions since the last case management conference. The Parties discussed Defendants' motion for clarification and Plaintiffs' proposed cross-motion, and expect that we will know if those motions need to proceed, in the next week at the outside. The Parties will inform the Court as soon as that decision is made. The Parties also discussed the issue raised by Defendants regarding Dr. Najafi, and are attempting to resolve the issue, but if unable to do so, Defendants advise that they intend to proceed on the briefing schedule already set by the Court.

Honorable Robert Kugler, U.S.D.J.  
Honorable Thomas I. Vanaskie (Ret.)  
April 6, 2022  
Page 2

Thank you for your courtesies and consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read "Adam M. Slater", is written over a horizontal line.

ADAM M. SLATER

Cc: All counsel of record (via ECF)